

David S. Rosenzweig, Esq.  
Keegan, Werlin & Pabian, LLP  
265 Franklin Street, Sixth Floor  
Boston, MA 02110

BY FAX AND U.S. MAIL

RE: NSTAR Electric, D.T.E. 03-121

February 6, 2004

Dear Mr. Rosenzweig:

Enclosed please find the Department's first set of information requests on the above-captioned matter. Responses should be filed on or before February 16, 2004. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.  
Hearing Officer

cc: Mary Cottrell  
Staff as assigned  
Joseph Rogers, Assistant Attorney General

Encl.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.
3. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

First Set of Department Information Requests

7. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

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FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to NSTAR Electric the following information requests.

- DTE 1-1      Refer to Exh. NSTAR-HCL-1, at 8, line 7. What is meant by “standby rights” in this sentence?
- DTE 1-2      Refer to Exh. NSTAR-HCL-1, at 26, lines 4-6. Is there a situation in which the contract demand could be decreased, such as if the generating capability or the expected output of the customer’s generation unit(s) was reduced by the customer?
- DTE 1-3      Refer to Exh. NSTAR-HCL-1, at 28. Please provide the calculation of what the customer would be charged under this example. Provide this calculation for Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company.
- DTE 1-4      Refer to Exh. NSTAR-HCL-1, at 28; G.L. c. 164, § 1G(e); and 220 C.M.R. § 11.03(4). Please explain how the 500 Kilowatt credit, as it is applied in this example, is consistent with the requirement that the transition charge be non-bypassable
- DTE 1-5      Refer to Exh. NSTAR-HCL-1, at 29, Lines 1-12. Please provide the calculation of what the customer would be charged under this example. Provide this calculation for Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company.
- DTE 1-6      Refer to Exh. NSTAR-HCL-2. Please provide the source data referenced.
- DTE 1-7      Refer to Exh. NSTAR-HCL-3. Please provide the source data referenced.
- DTE 1-8      Refer to Exh. NSTAR-HCL-4. Please provide the source data referenced.
- DTE 1-9      Refer to Exh. NSTAR-HCL-3, Note 1. Please explain why the billing quantities are discounted. In addition, please provide all calculations and workpapers that support the discount value of 4.94 percent.

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- DTE 1-10      Refer to Exh. NSTAR-HCL-4, Note 1. Please explain why the billing quantities are discounted. In addition, please provide all calculations and workpapers that support the discount values of 4.94 percent and 3.0 percent.
- DTE 1-11      Refer to Exh. NSTAR-HCL-4, Note 2. Please explain why the billing quantities are discounted. In addition, please provide all calculations and workpapers that support the discount value of 4.94 percent.
- DTE 1-12      Refer to Exh. NSTAR-HCL-1, at 23, Lines 19-21. Please explain why standby rates would not be “workable” if the Companies did not convert all applicable distribution rate components to a single demand charge for each season, as proposed.